

Todd L. Bice, Esq., Bar No. 4534
TLB@pisanellibice.com
Robert A. Ryan, Bar No. 12084
RR@pisanellibice.com
PISANELLI BICE PLLC
400 South 7th Street, Suite 300
Las Vegas, NV 89101
Telephone: 702.214.2100

Attorneys for MGM Resorts International

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LEKISHA MORRIS, on behalf of himself
and all others similarly situated,

Plaintiff,

vs.

MGM RESORTS INTERNATIONAL,
Defendant.

Case No. 2:20-cv-00749-GMN-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND
TO COMPLAINT
(SECOND REQUEST)**

Pursuant to Fed. R. Civ. P. 6(b) and LR IA 6-1, Plaintiff, Lekisha Morris (“Plaintiff”), and Defendant, MGM Resorts International (“MGM”), by and through their undersigned counsel of record, hereby stipulate and agree as follows:

1. Plaintiff filed her Complaint on April 27, 2020. (ECF No. 1)
2. Pursuant to LR 42-1, Plaintiff filed a Notice of Related Cases on April 29, 2020, advising the Court of eight other related matters presently filed in this district that involve the Defendant and contain similar questions of fact and the same questions of law.
3. In fact, in the lowest such case, *Smallman v. MGM Resorts International*, Case No. 2:20-cv-00376-JAD-NJK (the “*Smallman Case*”), all Federal Judges assigned to one of these matters, including: Judge Jennifer Dorsey, Judge Richard Boulware, Judge Kent Dawson, Judge Andrew Gordon, Judge James Mahan and Judge Gloria Navarro entered an Order Granting a Stipulation to Consolidate many of the actions in the lowest case number and assigned each such

1 action to Judge Jennifer Dorsey and Magistrate Judge Nancy Koppe. (*See* ECF No. 22 in Case
2 No. 2:20-cv-00376-JAD-NJK).

3 4. Pursuant to Paragraph 3 of that Order Granting Consolidation, the Parties were to
4 file a Notice of Related Cases to advise the Court of any additional actions that should be
5 consolidated into the *Smallman* Case.

6 5. As such, on May 13, 2020, MGM filed a Supplemental Notice of Related Cases in
7 the *Smallman* Case. (*See* ECF No. 78 in Case No. 2:20-cv-00376-JAD-NJK).

8 6. At present, based upon an stipulation of the parties approved by the Court,
9 MGM's deadline to respond to the Complaint in the *Smallman* Case is sixty (60) days from the
10 date of the filing of a Consolidated Complaint, while the deadline to file the Consolidated
11 Complaint is currently sixty (60) days from the entry of an order appointing interim class counsel
12 in the *Smallman* Case. (*See* ECF No. 61 in Case No. 2:20-cv-00376-JAD-NJK).

13 7. No order appointing interim class counsel has yet been entered in the *Smallman*
14 Case, leaving these deadlines undefined at the moment.

15 8. On June 10, 2020, Plaintiff in this action served the Complaint on MGM, which
16 would mean MGM would have until July 1, 2020 to respond to the Complaint in this case.

17 9. On June 23, 2020, Plaintiff filed a Stipulation and Order to Extend Deadline to
18 Respond to Complaint (First Request) (the "First Stipulation"), requesting an open extension of
19 time to respond to the Complaint. (*See* ECF No. 18)

20 10. On June 30, 2020, this Court granted the First Stipulation, in part, by extending the
21 deadline to respond to the Complaint to July 30, 2020. (*See* ECF No. 21)

22 11. As of today, this action has not yet been consolidated into the *Smallman* Case, as
23 anticipated by counsel for the Parties.

24 12. Therefore, along with the submission of this Stipulation, the Parties intend to file a
25 stipulation or joint motion in the *Smallman* Case to seek a ruling on consolidation.

26 13. In the interim, the Defendant seeks a second extension of 30 days to respond to the
27 Complaint in this action. Plaintiff does not oppose the extension.

1 14. Good cause exists for an additional extension as both Parties agree this case
2 should be transferred to the *Smallman* Case for judicial economy as the issues are identical.

3 15. Thus, the Parties stipulate that MGM shall have an additional thirty days to
4 respond to the Complaint, such that MGM's response shall be due on **August 28, 2020**.

5 **IT IS SO STIPULATED.**

6
7 DATED this 22nd day of June, 2020.

DATED this 22nd day of June, 2020.

8 PISANELLI BICE, PLLC

ALDRICH LAW FIRM, LTD.

9 By:/s/ Robert A. Ryan
10 Todd L. Bice, Esq., Bar No. 4534
Robert A. Ryan, Esq., Bar No. 12084
11 400 South 7th Street, Suite 300
Las Vegas, Nevada 89101

By:/s/ John P. Aldrich
John P. Aldrich, Esq., Bar No. 6877
7866 W. Sahara Avenue
Las Vegas, Nevada 89117

Attorneys for Plaintiff

12 *Attorneys for Defendant, MGM Resorts*
13 *International*

14
15 **ORDER**

16 IT IS SO ORDERED.

17
18 
19 United States Magistrate Judge

20 DATED: July 23, 2020
21 _____

PISANELLI BICE PLLC
400 SOUTH 7TH STREET, SUITE 300
LAS VEGAS, NEVADA 89101